

## **RESPONSE TO COMMENTS**

**DRAFT SITE INVESTIGATION REPORT  
AND DECISION DOCUMENT FOR THE  
FORMER ORDNANCE MOTOR REPAIR AREA  
PARCELS 75(7), 5(7), 6(7), 41(7), AND 42(7)  
FORT McCLELLAN, CALHOUN COUNTY, ALABAMA**

**RESPONSE TO COMMENTS BY THE  
U.S. ARMY CORPS OF ENGINEERS - MOBILE DISTRICT**

- Comment 1:**      **Page 1-1, Line 18. Typo. Change “no” to “not”.**
- Response 1:**      The text will be revised as noted.
- Comment 2:**      **Page 1-3, Line 5. Typo. Insert “in” after “included”.**
- Response 2:**      The text will be revised as noted.
- Comment 3:**      **Table 3-4. Well locations PPMP-75-GP71 and PPMP-75-GP74 are missing from the table.**
- Response 3:**      Water level measurements were not recorded for well locations PPMP-75-GP71 and PPMP-75-GP74 in March 2000. A footnote will be added to the table.
- Comment 4:**      **Table 3-6. Sample locations PPMP-75-SW/SD01, 02, 05, and 10 are missing from the table.**
- Response 4:**      Parameters were not recorded for sample locations PPMP-75-SW/SD01, 02, 05, and 10. A footnote will be added to the table.
- Comment 5:**      **Page 4-4, Line 34 and Figures 4-1 and 4-2 Legends. The geologic cross section locations are not depicted on Figure 3-1.**
- Response 5:**      Agree. Figure 3-1 will be revised per comment. Figure 4-2 (cross section B-B’) has been deleted. Figure 3-1 will be revised to show the location of cross section A-A’.
- Comment 6:**      **Page 6-2, Line 25. It should be made clear here that the no further action recommendation is based on future reuse other than residential, i.e., with restrictions. The proposed reuse for this area is industrial; therefore the no further action recommendation is appropriate. Land use controls will need to be placed on the property to limit reuse. This comment also applies to Page ES-2, Line 30.**

**Response 6:** Based on subsequent discussions and on the results of additional confirmation soil samples collected at the site, the BCT agreed to No Further Action with unrestricted land reuse.

**DRAFT DECISION DOCUMENT FOR NO FURTHER ACTION**

**Comment 1:** Page 4, First Column, Last Line. Change “polyaromatic hydrocarbon” to “polynuclear aromatic hydrocarbon”. Also, make the change on the acronym list on Page 6.

**Response 1:** The text will be revised.

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FORT McCLELLAN, CALHOUN COUNTY, ALABAMA**

**RESPONSE TO COMMENTS BY THE  
ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**

***General Comments***

**Comment 1:** ADEM agrees with the conclusions and recommendations of this SI Report. ADEM is aware that the analytical results for groundwater show metal concentrations to be greater than the background and site-specific screening levels in several wells. The metal concentrations were relatively high in the wells that exhibited high turbidity. ADEM is aware that that sampling techniques used for the sampling effort at the Former Ordnance Motor Repair Area were compared to new sampling techniques (slow purging) that were agreed upon by the BCT. Five existing temporary monitoring wells exhibiting high turbidity and high metal concentrations were resampled for unfiltered metals at Fort McClellan. The results of the resampling showed that the metal concentrations dropped significantly once the wells were resampled using low flow purging techniques. As a result of this comparison, ADEM believes that the high concentrations of metals exhibited in the wells at the Former Ordnance Motor Repair Area are a result of high turbidity.

**Response 1:** Comment noted.

**Comment 2:** Based on the analytical results from samples collected during the Site Investigation, it appears that operations at the site have had minimal impact on the environment, and the potential threat to human and ecological receptors from the site is low.

**Response 2:** Comment noted.

***Specific Comments***

**Comment 1:** Page 1-1/Section 1.0/Line 18: Delete “no” and add “not”.

**Response 1:** The text will be revised as noted.

**Comment 2:** Figure 1-1: Clarify the location of the Main Post in Figure 1-1.

- Response 2:** The figure will be revised indicating the boundary and other features of the Main Post at Fort McClellan.
- Comment 3:** **Figure 3-1: Cross sections A-A' and B-B' are not shown on this figure as stated from Page 4-4, Section 4.1.2, Line 34. Please show the cross section lines on Figure 3-1.**
- Response 3:** Figure 4-2 (B-B') has been deleted. Figure 3-1 will be revised to show the location of cross section A-A'.
- Comment 4:** **Figure 4-1: According to Appendix B "Well Logs", well PPMP-75-GP74 has well screens and is not shown on Figure 4-1. Table 3-4 does not present well location PPMP-75-GP74. Was well PPMP-75-GP74 dry? Why was PPMP-75-GP74 not included in Table 3-4 but shown in Figure 4-1 without screens? Please clarify.**
- Response 4:** PPMP-75-GP74 was sampled. Sampling information is located in Appendix A. Water level measurements were not recorded in March 2000 for well PPMP-75-GP74. Figure 4-1 and Table 3-4 will be revised to incorporate the necessary information.
- Comment 5:** **Figure 4-1: The figure shows Note: No. 2 "See Figure 3-1 for Cross Section Location.". Cross sections A-A' and B-B' are not shown on Figure 3-1. Please add the cross section locations to Figure 3-1.**
- Response 5:** See response to Comment #3.
- Comment 6:** **Figure 4-2: According to Appendix B "Well Logs", well PPMP-75-GP71 has well screens and is not shown on Figure 4-2. Table 3-4 does not present well location PPMP-75-GP71. Was well PPMP-75-GP71 dry? Why was PPMP-75-GP71 not included in Table 3-4 but shown in Figure 4-2 without screens? Please clarify.**
- Response 6:** PPMP-75-GP71 was sampled. Sampling information is located in Appendix A. Water level measurements were not recorded in March 2000 for well PPMP-75-GP71. Figure 4-2 and Table 3-4 will be revised to incorporate the necessary information.
- Comment 7:** **Figure 4-2: The figure shows Note: No. 2 "See Figure 3-1 for Cross Section Location.". Cross sections A-A' and B-B' are not shown on Figure 3-1. Please add the cross section locations to Figure 3-1.**
- Response 7:** See response to Comment #3.

- Comment 8:** Page 5-6/Section 5.3/Lines 7-9: The sentence, “The elevated turbidity readings were the result of suspended particulates from the groundwater-saturated formation.”, is misleading. The turbidity was a result of the sampling procedures and not the groundwater-saturated formation. The low-flow sampling techniques now being used have reduced the turbidity significantly. Please correct this statement or delete it.
- Response 8:** The text will be revised as necessary.
- Comment 9:** Page 6-2/Section 6.0: ADEM is aware that the language will be changing for the “No Further Action” as to the specifics of the land use and the land use controls. This language change was discussed in the September BRAC Cleanup Team (BCT) meeting.
- Response 9:** Based on subsequent discussions and on the results of additional confirmation soil samples, the BCT agreed to No Further Action with unrestricted land reuse.
- Comment 10:** Appendix B/Monitoring Well Installation Detail: Please describe the “Drilling Method:” on all the forms.
- Response 10:** The forms will be revised to include the drilling method.
- Comment 11:** Appendix F/Attachment A: Data Validation Qualifier Entry Verification Report: Sample Number KJ0001 through KJ0137 are lacking units. Please add the units to all sample results.
- Response 11:** The appendix will be revised to include the appropriate units.

## **DRAFT DECISION DOCUMENT**

### ***General Comments***

- Comment 1:** ADEM is aware that the language will be changing for the “No Further Action” as to the specifics of the land use and the land use controls. This language change was discussed in the September BRAC Cleanup Team (BCT) meeting. ADEM is in general agreement with the Draft Decision Document. ADEM is aware that the analytical results for groundwater show metal concentrations to be greater than the background and site-specific screening levels in several wells. The metal concentrations were relatively high in the wells that exhibited high turbidity. ADEM is aware that that sampling techniques used for the sampling effort at Former Ordnance Motor Repair Area were compared to new sampling techniques (slow purging) that were agreed upon by the BCT. Five existing temporary monitoring wells exhibiting high turbidity and high

**metal concentrations were resampled for unfiltered metals at Fort McClellan. The results of the resampling showed that the metal concentrations dropped significantly once the wells were resampled using low flow purging techniques. As a result of this comparison, ADEM believes that the high concentrations of metals exhibited in the wells at the Former Ordnance Motor Repair Area are a result of high turbidity.**

**Response 1:** Comment noted.

**Comment 2:** Based on the analytical results from samples collected during the Site Investigation, it appears that operations at the site have had minimal impact on the environment, and the potential threat to human and ecological receptors from the site is low.

**Response 2:** Comment noted.

*Specific Comments*

**Comment 1:** Figure 1 shows the Ft. McClellan boundaries but does not say that the area is Ft. McClellan. Please add “Ft. McClellan” and other features to the figure.

**Response 1:** Agree. The figure will be revised to reference the area shown as Fort McClellan as well as more details added.

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FORT McCLELLAN, CALHOUN COUNTY, ALABAMA**

**RESPONSE TO COMMENTS BY FORT McCLELLAN**

**COMMENTS ON DRAFT SITE INVESTIGATION REPORT**

**Comment 1: Page ES-1, line 4: Comment - Add the acronym FOMRA (Former Ordnance Motor Repair Area) to the List of Acronyms.**

**Rationale - The acronym is used in the document but not listed in the List of Acronyms.**

**Response 1:** FOMRA will be added to the list of acronyms.

**Comment 2: Figures 1-2, 1-4, 3-1, 5-1: Comment - Change the symbol for Buildings T-319, T-320 and T-321 to indicate they are existing buildings.**

**Rationale - The symbol used for the buildings on the figures is for removed buildings but they have not been removed.**

**Response 2:** The symbol for Buildings T-319, T-320, and T-321 will be changed to indicate they are existing buildings.

**Comment 3: Figures 1-2, 1-4, 3-1, 5-1: Comment - Move the building number “T-313” to the ramp directly north of the building where the number is shown on the figures.**

**Rationale - The building number is the number for the ramp.**

**Response 3:** Building number T-313 will be moved to the ramp as noted.

**Comment 4: Page 1-3, lines 3-4; Figures 1-2, 1-4, 3-1, 5-1: Comment - Add building numbers 304, 312 and 313 to the building numbers listed on Page 1-3, lines 3-4. T-312 should be shown on the figures.**

**Rationale - The building numbers are for facilities located in the area and are included in the list in Table 1-1. T-312 is not shown on the figures but is one of the facilities listed for the area.**

**Response 4:** The text will be revised per comment.



**Comment 5: Figure 3-1: Comment - Add cross sections A-A' and B-B' locations on Figure 3-1.**

**Rationale - Figures 4-1 and 4-2 indicate the locations of the cross sections are shown on Figure 3-1 but they aren't.**

**Response 5:** Figure 4-2 (B-B') has been deleted. Figure 3-1 will be revised to show the location of geologic cross section A-A'.

**Comment 6: Table 3-1: Comment - Change "southwest" to "southeast" in the first line of the Sample Location Rationale for Sample Location PPMP-75-GP04.**

**Rationale - The sample location is southeast of Building 337, not southwest.**

**Response 6:** The direction will be changed as noted.

**Comment 7: Table 3-3: Comment - Verify information on the well depth and sump interval for PPMP-75-GP50.**

**Rationale - The boring log and well log for this well indicate the bottom of the borehole is at 21.0' with no borehole collapse indicated.**

**Response 7:** The well depth of PPMP-75-GP50 is 19.3 feet. No sump was installed.

**Comment 8: Figure 4-1: Comment - Change the figure to correct the designation of the material from "shale" to "weathered shale" on PPMP-75-GP73.**

**Rationale - The material shown as "shale" for PPMP-75-GP73 is shown as "weathered shale" on the boring log for the well.**

**Response 8:** The material will be indicated as weathered shale as noted.

**Comment 9: Figure 4-2: Comment - Change the figure to show the correct well depth for PPMP-75-GP71.**

**Rationale - The well depth shown in Table 3-3 is 16.5 feet.**

**Response 9:** The well depth for PPMP-75-GP71 will be shown on Figure 4-2 as 16.5 feet.

**Comment 10: Page 5-5, line 30: Comment - Change "fifteen" to "thirteen".**

**Rationale - Table 5-3 shows sample location PPMP-75-GP69 contains thirteen, not fifteen of the nineteen detected metals.**

**Response 10:** The text will be revised as noted.

**Comment 11: Page 5-7, line 14: Comment - Change “Each” to “Eighteen” and “was” to “were”.**

**Rationale - Table 5-4 shows eighteen, not all nineteen, of the detected metals were present at sample location PPMP-75-SW/SD01.**

**Response 11:** The text will be revised as noted.

**Comment 12: Page 5-9, paragraph 5.5: Comment - Add information on PCBs, TOC and grain size analysis.**

**Rationale - Table 3-7 shows PCBs, TOC and grain size included in the analytical suite for sediment but no information is provided on their analysis.**

**Response 12:** PCBs were not detected in the sediment samples. Grain size and TOC information will be added to the text for sediment.

**Comment 13: Appendix A, Sample Collection Logs: Comment - Fill out incomplete sections of the sample collection logs.**

**Rationale - Many of the sample collection logs have sections (Sketch Location, Logged By/Date and Reviewed By/Date) that have not been completed.**

**Response 13:** IT will ensure that all paperwork is properly filled out in the future.

**Comment 14: Appendix A, Analysis Request and Chain of Custody Record, Reference Document No: 75-022499-QSK: Comment - It appears that this record should be deleted.**

**Rationale - The samples this record covers are not included in the sampling for this site investigation.**

**Response 14:** Appendix A will be revised as noted.

**Comment 15: Appendix B, HTRW Drilling Log, PPMP-75-GP39: Comment - Change the elevations on the log to show a surface elevation of 774.73.**

**Rationale - The surface elevation for the area where the sample was taken is in the 770s not the 740s.**

**Response 15:** The boring log for PPMP-75-GP39 will be revised as noted.

**Comment 16: Appendix B, HTRW Drilling Log, PPMP-75-GP75: Comment - Label PPMP-75-GP75 on the Location Sketch.**

**Rationale - The label has been omitted on the sketch.**

**Response 16:** PPMP-75-GP75 will be shown on the boring log as noted.

**Comment 17: Appendix B, Monitoring Well Installation Detail, PPMP-75-GP55:**  
**Comment - Change “2.05” to “1.84” on the Stickup entry.**

**Rationale - The stickup is 1.84’ instead of 2.05’ according to the ground surface elevation and top of well casing elevation.**

**Response 17:** The well log will be revised as noted.

**Comment 18: Appendix D, Ground Elevation Column, PPMP-75-GP39: Comment - Change “744.73” to “774.73”.**

**Rationale - The surface elevation for the area of the sample location is in the 770s not the 740s.**

**Response 18:** The table will be revised per comment.

#### **COMMENTS ON DRAFT DECISION DOCUMENT**

**Comment 1: Page 1, Regulations Governing Site, first column, line 7: Comment - Add the acronym “DOD” to the acronyms on page 6.**

**Rationale - The acronym is used in the document but not included in the list of acronyms.**

**Response 1:** Agree. The text will be revised per comment.

**Comment 2: Page 2, Site Background, first column, line 4: Comment - “18,946” should be changed to “18,929”.**

**Rationale - The correct acreage of the Main Post is 18,929 acres.**

**Response 2:** Agree. The text will be revised per comment.

**Comment 3: Page 4, Site Investigation, first column, second paragraph: Comment - Include information about TOC and grain size being included in the analytical suite for sediment.**

**Rationale - TOC and grain size were included in the analytical suite for sediment but are not mentioned.**

**Response 3:** Agree. The text will be revised per comment.

**Comment 4: Page 7, Signature Blocks: Comment - Change the second line of the signature block for Mr. Ryan from “Fort McClellan BRAC Site Manager” to “Site Manager”**

**Rationale - The correct position title for Mr. Ryan is Site Manager.**

**Response 4:** Agree. The text will be revised per comment.

**Comment 5: Figure 1: Comment - Move the building number “T-313” to the ramp directly north of the building where the number is shown on the figure.**

**Rationale - The building number is the number for the ramp.**

**Response 5:** The figure will be revised per comment.

**Comment 6: Figure 1: Comment - Remove the building numbers from T-334 and T-329.**

**Rationale - The buildings have been removed.**

**Response 6:** The figure will be revised per comment.

**Comment 7: Figure 1: Comment - Show T-312 on the figure.**

**Rationale - T-312 is not shown on the figure but is one of the facilities listed for the area.**

**Response 7:** The figure will be revised per comment.